

"Approved
by the decision of the Board
of the JSC "EIC" KazakhExport"
dated September 29, 2023 No. 66"

Anti-corruption policy
of the Joint Stock Company "Export Insurance Company "KazakhExport"
(subject to changes and additions as of 12/22/2023)

Astana, 2023

SUMMARY OF IR

Name of IR	Anti-corruption policy of the JSC "EIC "KazakhExport"
Owner of IR	Compliance Service
Access level	Public
Measures to familiarize structural units with IR	Mailing by e-mail within 1 (one) working day from the date of placement of the IR on the network disk "Internal Portal"

Content

Chapter 1. General provisions	4
Chapter 2. Types of corruption offenses	5
Chapter 3. Anti-corruption measures.....	5
Chapter 4. Anti-corruption monitoring.....	6
Chapter 5. Internal analysis of corruption risks.....	7
Chapter 6. Anti-corruption standards	8
Chapter 7. Anti-corruption restrictions.....	8
Chapter 8. Prevention and resolution of conflicts of interest	10
Chapter 9. Formation of an anti-corruption culture.....	10
Chapter 10. Financial control measures	10
Chapter 11. Corruption prevention measures	11
Chapter 12. Final provisions.....	12
Appendix 1	14
Appendix 2	16
Appendix 3	17
Appendix 4	18

Chapter 1. General provisions

1. The Anti-Corruption Policy of the KazakhExport Export Insurance Company Joint Stock Company (hereinafter referred to as the Policy) has been developed in accordance with the legislation of the Republic of Kazakhstan and other internal documents of the KazakhExport Export Insurance Company Joint Stock Company (hereinafter referred to as the Company).

2. The policy sets:

- 1) the main provisions on combating corruption in Society;
- 2) managerial and organizational bases for the prevention of corruption offenses;
- 3) measures to combat corruption, as well as to minimize and (or) eliminate their consequences;
- 4) education of the Company's employees in the conduct of strict compliance with the requirements of the legislation of the Republic of Kazakhstan and internal documents of the Company.

3. The purpose of the Policy is to strengthen control over the prevention and detection of corruption, as well as the formation of an atmosphere of their harsh rejection in Society.

4. The objective of the Policy is to form a legal culture of the Company's employees, ensuring compliance with the principles of honesty and transparency in the performance of work duties.

5. The following terms and definitions are used in the Policy:

1) conflict of interests - a contradiction between the personal interests of persons performing managerial functions in the Company and their official powers, in which the personal interests of these persons may lead to improper performance of their official powers;

2) a corruption offense is an unlawful guilty act (action or omission) that has signs of corruption, for which administrative or criminal liability is established by law;

3) corruption - illegal use by a person performing managerial functions in the Company, an employee of the Company of his official (official) powers and related opportunities in order to obtain or extract personally or through intermediaries property (non-property) benefits and advantages for himself or third parties, as well as bribery of these persons by providing benefits and advantages;

4) anti-corruption - the activities of persons performing managerial functions in the Company, employees of the Company within their powers to prevent corruption, including the formation of an anti-corruption culture in the company, the identification and elimination of causes and conditions conducive to the commission of corruption offenses, as well as the identification, suppression, disclosure and investigation of corruption offenses and elimination their consequences;

5) counterparty – a natural or legal person with whom the Company has entered or plans to enter into relations regulated by civil law;

6) a person performing managerial functions in the Company - permanently, temporarily or by special authority performing organizational and administrative or administrative-economic functions in the Company;

7) employee – an individual who is in an employment relationship with the Company and directly performs work under an employment contract, with the exception of members of the executive body of the Company;

8) the authorized anti-corruption body - the central executive body in the field of public service and anti-corruption, and its department, their territorial divisions, performing within their powers the functions of implementing the anti-corruption policy of the Republic of Kazakhstan and coordination in the field of anti-corruption;

9) Compliance Service is a structural subdivision of the Company, directly subordinate and accountable to the Board of Directors of the Company, organizing and carrying out measures to counteract the legalization of proceeds from crime and the financing of terrorism in the Company's activities, internal control over the compliance of the Company's activities with the requirements

of the legislation of the Republic of Kazakhstan, international standards, internal rules and internal documents of the Company, implementation of the Compliance Risk Management Policy and compliance control functions, organization and functioning of the anti-corruption and fraud system;

10) insider transaction – illegal transactions with securities or other financial instruments using confidential information available only to a narrow circle of persons;

11) legalization (laundering) of proceeds from crime - involvement in the legal circulation of money and (or) other property obtained by criminal means through transactions in the form of conversion or transfer of property representing proceeds from criminal offenses, or possession and use of such property, concealment or concealment of its true nature, source, location, method of disposal, transfer, rights to property or its accessories, if it is known that such property represents income from criminal offenses, as well as mediation in the legalization of money and (or) other property obtained by criminal means;

12) facilitation payments – payments or transfer of monetary amounts in cash or non-cash form to civil servants, persons performing managerial functions in quasi-public sector entities, for simplification of formal procedures or their accelerated implementation in the interests of the person who makes such payments or in the interests of third parties.

Chapter 2. Types of corruption offenses

6. Corruption offenses include acts for which the current legislation of the Republic of Kazakhstan provides for administrative or criminal liability, including:

1) giving or receiving a bribe, as well as mediation in the transfer of a bribe, including facilitation payments;

2) obtaining other property benefits and advantages in accordance with anti-corruption legislation;

3) intentional misstatement of financial statements;

4) misuse and (or) appropriation and (or) theft of the Company's assets: theft of funds, misuse of funds, theft of fixed assets, inventory;

5) actions of a corrupt nature, abuse of official powers and abuse of official powers: the use of one's official powers and related opportunities to obtain property benefits, violations in the procurement of goods, works, services expressed in forgery and (or) falsification of documents, special overstatement or understatement of the price of goods, works, services for receiving monetary rewards, expensive gifts or other benefits, intentional destruction of information relevant to the Company's activities, destruction of databases or modification of information in them, the introduction of programs to ensure access to third parties or for personal purposes;

6) actions performed by counterparties for the purpose of obtaining additional profit, other actions, as a result of which damage may be caused to the Company and (or) the state;

7) provision by counterparties of knowingly false, altered or distorted information for the purpose of deception or deception and profit at the expense of the Company;

8) actions aimed at unauthorized penetration into the information systems of the Company or the acquisition of confidential information in order to make a profit and (or) damage the activities and (or) a negative impact on the reputation of the Company;

9) legalization (laundering) of proceeds from crime, insider transactions, as well as other types of corruption offenses provided for by the current legislation of the Republic of Kazakhstan.

Chapter 3. Anti-corruption measures

7. Anti-corruption measures include the following:

1) anti-corruption monitoring;

- 2) internal analysis of corruption risks;
 - 3) approval of anti-corruption standards and procedures to prevent or minimize the risks of legalization (laundering) of proceeds from crime;
 - 4) adoption of anti-corruption restrictions by persons performing managerial functions in the Company;
 - 5) financial control measures;
 - 6) prevention and resolution of conflicts of interest;
 - 7) reporting to the authorized anti-corruption body on the work done to combat corruption in the Company;
 - 8) coordination with the Company's counterparties of issues related to the latter's compliance with the provisions of this Policy, the development by counterparties of their own anti-corruption procedures, the inclusion of anti-corruption clauses in the text of agreements and contracts concluded with counterparties, as well as other measures provided for by the current legislation of the Republic of Kazakhstan.
8. Procedures for preventing or minimizing the risks of legalization (laundering) of proceeds from crime in the Company's activities are provided for in the Internal Control Rules for Countering the Legalization (Laundering) of Proceeds from Crime and the Financing of terrorism, approved by the decision of the Board of Directors of the Company.

Chapter 4. Anti-corruption monitoring

9. Anti-corruption monitoring is the Company's activity in collecting, processing, summarizing, analyzing and evaluating information related to the effectiveness of anti-corruption policy, the state of law enforcement practice in the field of combating corruption, as well as the perception and assessment of the level of corruption by the Company.

10. The subject of anti-corruption monitoring is the Company's activities. Anti-corruption monitoring is carried out in accordance with the procedure provided for by the regulatory legal act of the authorized state body of the Republic of Kazakhstan, including by:

- 1) conducting a compliance examination of draft internal regulations of the Company for the presence of corruption-related norms in them;
- 2) monitoring the legislation of the Republic of Kazakhstan, as well as the legislation of foreign states that affect the Company's activities;
- 3) consideration of appeals from clients of individuals and legal entities on the facts of corruption on the part of persons performing managerial functions in the Company and employees of the Company;
- 4) conducting official investigations on the revealed facts of violation of the legislation of the Republic of Kazakhstan and internal documents of the Company that have signs of a corruption offense;
- 5) monitoring of publications in the mass media about the activities of the Company and persons performing managerial functions in the Company;
- 6) studying the law enforcement practice of state bodies and quasi-public sector entities in the field of anti-corruption;
- 7) studying the causes and conditions that contribute to corruption in the activities of persons found guilty in accordance with the procedure established by law;
- 8) study of materials and other procedural documents prepared by the Legal Support Department of the Company in criminal cases of corruption and fraud or cases of administrative corruption offenses.

11. The Compliance Service conducts quarterly anti-corruption monitoring, the results of which, drawn up in accordance with Annex 4 to this Policy, serve as the basis for conducting an internal analysis of corruption risks.

Chapter 5. Internal analysis of corruption risks

12. Internal analysis of corruption risks (hereinafter referred to as Analysis) refers to the activity of identifying and studying the causes that contribute to the commission of corruption offenses.

13. The decision to conduct the Analysis is made based on the results of internal or external audit, anti-corruption monitoring, instructions from the Sole Shareholder of the Company or authorized state bodies of the Republic of Kazakhstan, as well as on the results of compliance risk assessment conducted in accordance with the procedure defined by the Company's internal regulatory documents.

14. The object of the Analysis is the activity of one or several structural divisions of the Company (hereinafter referred to as the Division).

15. The analysis is carried out by employees of the Compliance Service at least once during a calendar year according to the order of the Chairman of the Management Board of the Company or his replacement (hereinafter referred to as the Order) on the basis of a memo from the head of the Compliance Service justifying the need for an Analysis of the Company's Division. If necessary, the Head of the Compliance Service, in agreement with the Chairman of the Management Board of the Company or a person replacing him, may involve employees of other disinterested structural divisions of the Company.

16. The order must include the following information:

- 1) name of the Division whose activity is subject to Analysis;
- 2) direction of Analysis;
- 3) Full name of the employee of the Company responsible for the Analysis;
- 4) Analysis period;
- 5) a person performing managerial functions in the Company, who is entrusted with the management, coordination and responsibility for conducting the Analysis.

17. The analysis is carried out in the following areas:

- 1) identification of corruption risks in the Company's internal regulatory documents affecting the activities of the Division;
- 2) identification of corruption risks in the organizational and managerial activities of the Unit.

18. The organizational and managerial activities of the Unit include the following issues:

- 1) personnel management, including staff turnover;
- 2) conflict of interest settlement;
- 3) compliance of the Unit's activities with the Company's internal regulatory documents and the legislation of the Republic of Kazakhstan.

19. The sources of information for the Analysis are:

- 1) internal regulatory and other documents of the Company, regulatory legal acts of the Republic of Kazakhstan affecting the activities of the Division;
- 2) results of inspections previously carried out by state bodies or the Internal Audit Service of the Company in relation to the Division;
- 3) results of compliance risk assessment;
- 4) publications in the media;
- 5) appeals of individuals and legal entities received by the Division;
- 6) acts of prosecutorial supervision;
- 7) judicial acts;
- 8) other information, the provision of which is allowed by the legislation of the Republic of Kazakhstan.

20. Responsibility for the timely and complete presentation of the information specified in paragraph 19 of this Policy is assigned to the head of the Department.

21. Based on the results of the Analysis, an analytical report is prepared containing:

- 1) information on identified corruption risks;
- 2) recommendations for their elimination;
- 3) deadlines for the implementation of recommendations to eliminate identified corruption risks.

22. The Analytical report is coordinated with the head of the Department in whose activities the Analysis was carried out and signed by the person performing managerial functions in the Company specified in subparagraph 5) of paragraph 16 of this Policy.

23. An analytical report with recommendations on the elimination of identified corruption risks is submitted to the Chairman of the Management Board of the Company for consideration and giving instructions for taking measures to eliminate them.

24. The results of the Analysis are posted on the Company's Internet resource no later than 5 (five) working days from the date of the relevant consent of the Chairman of the Management Board of the Company.

Chapter 6. Anti-corruption standards

25. Anti-corruption standards are a system of recommendations established for the Company's activities aimed at preventing corruption. The Company's anti-corruption standards are presented in Appendix No. 1 to this Policy.

Chapter 7. Anti-corruption restrictions

26. In order to prevent persons performing managerial functions in the Company from committing actions that may lead to the use of their powers in personal, group and other non-official interests, these persons assume anti-corruption restrictions on:

- 1) implementation of activities incompatible with the performance of functional duties in the Company;
- 2) inadmissibility of joint service (work) of close relatives, spouses and relatives;
- 3) the use of official and other information that is not subject to official dissemination in order to obtain or extract property and non-property benefits and advantages;
- 4) acceptance of material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions are included in the official powers of the persons specified in the first paragraph of this paragraph, or these persons, by virtue of their official position, can contribute to such actions (inaction);
- 5) opening and holding accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan.

The consent of persons performing managerial functions in the Company to adopt anti-corruption restrictions is formalized by the Human Resources Management Department of the Company in accordance with Annex 3 to this Policy no later than 5 (five) working days from the date of their assumption of office.

Failure to accept anti-corruption restrictions by persons performing managerial functions in the Company entails refusal to accept a position or dismissal (dismissal from office, termination of powers), their non-compliance in cases of absence of signs of a criminal offense and an administrative offense is the basis for termination of their powers.

27. Persons performing managerial functions in the Company are prohibited from:

- 1) independently participate in the management of an economic entity, if the management or participation in the management of an economic entity is not included in their official duties in accordance with the laws of the Republic of Kazakhstan, to promote the satisfaction of the material

interests of organizations or individuals through the misuse of their official powers in order to obtain property or other benefits;

2) engage in entrepreneurial activity, except for the acquisition and (or) sale of shares of open and interval mutual investment funds, bonds on the organized securities market, shares of commercial organizations (common shares in the amount not exceeding five percent of the total number of voting shares of organizations) on the organized securities market;

3) engage in other paid activities, except for pedagogical, scientific and other creative activities.

28. Persons performing managerial functions in the Company have the right to lease (lease) a dwelling belonging to them by right of ownership and receive income from such rental.

29. Persons performing managerial functions in the Company, within 30 (thirty) calendar days from the date of taking office, are obliged to transfer to trust management for the duration of these functions in accordance with the procedure established by the laws of the Republic of Kazakhstan, the property belonging to them, the use of which entails income, with the exception of money, bonds, shares of open and interval shares investment funds legally owned by these persons, as well as property transferred to the property lease.

30. The contract for the trust management of property is subject to notarization.

31. In case of acquisition of shares (participation shares in the authorized capital) of commercial organizations and other property, the use of which entails income, with the exception of bonds, shares of open and interval mutual investment funds, persons performing managerial functions in the Company are obliged to transfer them to trust management within 30 (thirty) calendar days from the date of acquisition in accordance with the procedure established by the laws of the Republic of Kazakhstan.

Persons performing managerial functions in the Company are obliged to submit to the Human Resources Management Department of the Company a copy of the notarized contract for the trust management of property within 10 (ten) working days after the notarization of the contract.

32. Failure by persons performing managerial functions in the Company to fulfill the obligations provided for in this Chapter is the basis for applying disciplinary penalties to them, including the early termination of their respective powers.

33. Persons performing managerial functions in the Company may not hold positions that are directly subordinate to the positions held by their close relatives and (or) spouse (spouse), as well as relatives.

Persons performing managerial functions in the Company that violate the requirements of this paragraph of the Policy, if they do not eliminate it voluntarily within three months from the moment of detection of the specified violation, are subject to transfer to positions excluding such subordination, and if such transfer is impossible, one of these employees is subject to dismissal from office or other exemption from these functions.

Note.

Close relatives are understood to mean parents (parent), children, adoptive parents (adoptive parents), adopted (adopted), full- and half-siblings, grandparents, grandchildren, relatives - brothers, sisters, parents and children of the spouse (spouse).

34. The Compliance Service monitors compliance with the accepted anti-corruption restrictions by persons performing managerial functions in the Company.

35. Persons performing managerial functions in the Company, as well as the Department of Human Resources Management, inform the Compliance Service about all cases that violate or may violate the anti-corruption restrictions provided for by this Policy, no later than 2 (two) working days from the day when they became aware of such cases.

36. If the facts of violations of anti-corruption restrictions are discovered, the Compliance Service, no later than 2 (two) working days from the date of their discovery, brings the relevant information to the attention of the Chairman of the Management Board of the Company and the

Human Resources Management Department, indicating the need to eliminate such violations within the time limits provided for by this Policy and other internal documents of the Company.

Information on the revealed facts of violations of anti-corruption restrictions and the measures taken in this regard is subject to mandatory inclusion in the quarterly report on the work carried out by the Compliance Service, which is provided to the Audit Committee and the Board of Directors of the Company.

Chapter 8. Prevention and resolution of conflicts of interest

37. Persons performing managerial functions in the Company are prohibited from performing official duties if there is a conflict of interests. Persons performing managerial functions in the Company are obliged to take measures to prevent and resolve conflicts of interest. Persons performing managerial functions in the Company are obliged to immediately notify the immediate supervisor (if any) or the Company's management, Compliance Service in writing about the conflict of interests that has arisen or about the possibility of its occurrence as soon as they become aware of it.

The direct manager (if any) or the management of the Company, upon requests from persons performing managerial functions in the Company or upon receipt of information from other sources, are obliged to take timely measures in accordance with the procedure established by the Company's internal regulatory documents on the settlement of corporate conflicts and conflicts of interest.

Chapter 9. Formation of an anti-corruption culture

38. The formation of an anti-corruption culture is the duty of every manager and employee of the Company.

In order to form an anti-corruption culture, the Compliance Service and the Human Resources Management Department carry out anti-corruption education activities for the Company's employees during each calendar year, taking into account internal and external training schedules.

Employees of the Information and Communications Department ensure the formation of an anti-corruption culture by posting information and explanatory materials on measures to counteract and prevent fraud and corruption on the Company's corporate Internet resource.

Chapter 10. Financial control measures

39. The declaration of assets and liabilities is submitted by candidates for a position related to the performance of managerial functions in the Company, as well as their spouses, before the issuance of an official (body) act the company having the right of appointment to a position, on appointment to a position (as of the first day of the month of submission of the declaration).

40. The declaration of income and property is submitted by persons performing managerial functions in the Company and their spouses.

41. Declarations on assets and liabilities, income and property are drawn up in accordance with the tax legislation of the Republic of Kazakhstan and submitted in the form, in the manner and within the time limits determined by the tax legislation of the Republic of Kazakhstan.

42. In case of acquisition of property determined by the tax legislation of the Republic of Kazakhstan during the reporting calendar year, persons performing managerial functions in the Company and their spouses in the income and property declaration reflect information about the sources of covering the costs of acquiring the specified property.

43. Failure to submit a declaration of assets and liabilities and (or) a declaration of income and property, or submission of incomplete, unreliable information in such declarations, if the act does not contain signs of a criminal offense:

by the persons specified in paragraph 39 of this Policy, is the basis for refusing to grant the person the appropriate powers;

persons specified in paragraph 40 of this Policy shall incur liability provided for by the Code of the Republic of Kazakhstan on Administrative Offenses.

Paragraph 44 is suspended until January 1, 2025.

44. The Human Resources Management Department of the Company, no later than December 31 of the year following the reporting calendar year, places on the corporate Internet resource of the Company the information reflected in the declarations of persons performing managerial functions in the Company and their spouses.

Persons performing managerial functions in the Company are required to submit the necessary information to the Human Resources Management Department by December 1 of the year following the reporting calendar year.

The list of information to be published is determined in accordance with the legislation of the Republic of Kazakhstan.

45. The Compliance Service monitors and controls the timely provision of declarations on assets and liabilities, income and property by persons performing managerial functions in the Company, as well as ensuring that they provide these declarations by their spouses.

Chapter 11. Corruption prevention measures

46. Prevention of corruption in the Company is carried out in accordance with the procedure provided for by the relevant internal regulatory document of the Company, including by:

- 1) carrying out verification of counterparties to establish business reputation and identify conflicts of interest;
- 2) accounting of affiliated persons of the Company and persons connected with it by special relations;
- 3) examination of drafts of internal regulatory documents of the Company in order to exclude norms that create conditions for corruption in the Company;
- 4) ensuring information security in Society;
- 5) ensuring the functioning of feedback mechanisms in which persons performing managerial functions in the Company, employees and contractors of the Company, as well as individuals and legal entities can inform the Compliance Service of their suspicions or provide it with information received from other persons about possible corruption offenses committed by any person performing managerial functions in the Company, an employee of the Company, an official, a representative of the counterparty of the Company;
- 6) conducting official investigations on possible cases of corruption.

47. Persons who have information about a corruption offense being prepared, committed or committed, or the conditions for a corruption offense to be committed by a person performing managerial functions in the Company or an employee of the Company, are obliged to inform the Chairman of the Management Board of the Company (the person replacing him) or the Compliance Service about their suspicions through any of the following communication channels:

- 1) the email address of the "Senim hotline" indicated on the Company's corporate Internet resource;
- 2) the phone number of the "Senim" hotline specified on the Company's corporate Internet resource;
- 3) e-mails of Compliance Service employees indicated on the Company's corporate Internet resource.

48. When the Chairman of the Management Board of the Company (the person replacing him) receives appeals about possible or known cases of corruption, illegal actions of a person performing managerial functions in the Company or an employee of the Company, such appeals are sent to the Compliance Service for consideration and taking measures to verify the arguments set out in these appeals.

49. Information about a corruption offense sent through communication channels with the Company is accepted for consideration regardless of the official position of the person who sent the appeal, as well as the person against whom it is sent.

50. The Company guarantees that the applicant will not be subjected to sanctions and other adverse consequences if the appeal was made by him in good faith without malicious intent, but the information contained in it was not confirmed by the results of consideration of the appeal.

51. The Company guarantees that the Company's employees and other persons who have provided assistance in combating corruption will not suffer from harassment and discrimination.

Guarantees of protection and non-prosecution of employees of the Company and other persons reporting information on cases of corruption or fraud in the Company, except those established by the legislation of the Republic of Kazakhstan, are given in Appendix 5 of this Policy.

52. For each reasonable suspicion of possible cases of corruption offenses, illegal actions of a person performing managerial functions in the Company or an employee of the Company, internal investigations will be conducted in accordance with the procedure provided for by the Rules on Preventing and Combating Fraud and Corruption of the Company.

53. If the results of an internal investigation reveal signs or facts of corruption, the completion of the internal investigation is considered to be the adoption of corrective measures and improvement of internal procedures based on the principle of zero tolerance for any manifestations of corruption, including termination of employment relations and the transfer of materials to the relevant authorized state bodies.

54. Any person who has sufficient grounds to believe that a corruption offense has been committed should not attempt to independently verify, investigate or discuss the information received with other persons.

54-1. Confidentiality of information on the application of an employee of the Company or a person who was previously an employee of the Company to the management of the Company and (or) to authorized state bodies in order to assist in combating corruption is ensured if there is an agreement on non-disclosure of information on the provision of assistance by this person in combating corruption, in accordance with Appendix 6 of this Policy.

Chapter 12. Final provisions

55. Persons performing managerial functions in the Company and employees of the Company for committing corruption offenses bear criminal, administrative, civil and disciplinary responsibility in accordance with the laws of the Republic of Kazakhstan.

56. Persons performing managerial functions in the Company and employees of the Company to whom criminal, administrative or disciplinary measures have been applied for committing corruption offenses are not exempt from liability for compensation of material damage to the Company.

57. Employees and structural divisions of the Company are responsible for fulfilling the requirements of the Policy within their competence.

58. Persons performing managerial functions in the Company and employees of the Company from the date of adoption of the Policy, and newly accepted from the beginning of the performance of official and (or) labor duties in the Company are required to confirm in the form provided for in Appendix No. 2 to the Policy that they have studied, understood and undertake to follow the Policy in good faith.

59. Persons performing managerial functions and employees of the Company are obliged to take measures established by the Law of the Republic of Kazakhstan "On Combating Corruption", including the adoption of anti-corruption restrictions and financial control, as well as the provision of tax returns in accordance with the tax legislation of the Republic of Kazakhstan.

60. Other things not provided for in this Policy are regulated by the current legislation of the Republic of Kazakhstan. If there are contradictions of this Policy to the norms of the legislation of the Republic of Kazakhstan, the norms of the legislation of the Republic of Kazakhstan are subject to application.

**Anti-corruption standards
of the joint stock company
“Export Insurance Company "KazakhExport"”**

1. The anti-corruption standards of the KazakhExport Export Insurance Company Joint Stock Company (hereinafter referred to as the Company) have been developed in accordance with paragraph 2 of Article 10 of the Law of the Republic of Kazakhstan "On Combating Corruption" and internal documents of the Company.

2. Anti-corruption standards are aimed at achieving an atmosphere of intolerance to any manifestations of corruption in Society by creating for the Company's employees (hereinafter referred to as employees) a system of value and moral anti-corruption guidelines for behavior in the exercise of their official duties and functions.

3. The name of the sphere of public relations: insurance (reinsurance) activity.

4. Anti-corruption standards define the following standards of conduct for the Company's employees:

1) be guided by the principle of legality, the requirements of the Constitution, laws and other regulatory legal acts of the Republic of Kazakhstan, strictly comply with anti-corruption legislation;

2) ensure the observance and protection of the rights, freedoms and legitimate interests of individuals and legal entities;

3) to prevent the commission of actions capable of discrediting Society;

4) report to the direct or direct supervisor about the occurrence of a conflict of interest, personal interest in the performance of official duties, about the inclination to corrupt behavior and receiving gifts;

5) not to be guided by personal and (or) selfish interests in the performance of official duties;

6) refrain from addressing colleagues and managers with unlawful requests that violate the established order of relations, which may affect their making an impartial decision in the performance of their official duties;

7) not to incite other employees to commit corruption offenses and not to encourage such actions;

8) do not accept gifts in connection with the performance of official duties and powers;

9) not to use official and other information that is not subject to dissemination in order to obtain or extract property and non-property benefits and advantages;

10) refuse to be appointed to a position if it is connected with direct subordination or control to persons who are in close kinship and family relations (*parents, spouses, brothers, sisters, children, relatives (brothers, sisters, parents and children of the spouse)*);

11) to be active in combating corruption, in uncovering corruption offenses;

12) immediately report to the management of the Company on known facts of corruption, including the inducement to receive any benefit for expedited consideration of materials or facts of red tape;

13) immediately inform your direct or immediate supervisor in writing about doubts about the legality of the order received for execution;

14) contact a higher-level supervisor if the direct supervisor himself is involved in a conflict of interest;

15) to support and demand from colleagues the observance of a high legal anti-corruption culture;

16) to take measures on an ongoing basis to eliminate the causes and conditions of possible conflict of interest, corruption offenses and their consequences;

17) refrain from assisting anyone in carrying out entrepreneurial and (or) other activities related to the extraction of income;

18) refrain from representing or lobbying the interests of third parties, as well as performing actions on their behalf;

19) not to use for non-official purposes the means of material, technical, financial and information support, as well as other state property and official information.

5. Managers at all levels in relations with subordinates need:

1) to prevent cases of recruitment and placement of personnel on the grounds of kinship, fraternity and personal devotion, to ensure compliance with the principles of meritocracy;

2) accurately determine the tasks and scope of the official powers of subordinate employees;

3) to prevent an uneven distribution of the workload between employees who are subordinate;

4) to show fairness and objectivity in assessing the performance of subordinates, as well as the application of incentives and penalties;

5) not to give subordinates orders that are clearly impossible or beyond the scope of their official duties, as well as orders that contradict the law;

6) not to use the official position to influence the activities of subordinates in solving issues of an off-duty nature;

7) not to force subordinate employees to commit corruption offenses;

8) to prevent and prevent violations of anti-corruption legislation by subordinates and other employees;

9) promptly take comprehensive measures to resolve the conflict of interests that arose in the subordinate employee during the performance of his official duties;

10) take comprehensive measures to prevent corruption;

11) eliminate the causes and conditions that contribute to the commission of corruption offenses by subordinates;

12) to prevent the involvement of subordinates to perform off-duty or personal tasks;

13) set an example to subordinate employees by their impeccable behavior.

6. Managers at all levels ensure compliance with these Anti-Corruption Standards and organize anti-corruption work among employees subordinate to them.

CONFIRMATION

Use this form to confirm that you have carefully studied, understood and undertake to faithfully follow the Anti-Corruption Policy of the Export Insurance Company KazakhExport Joint Stock Company (hereinafter referred to as the Policy).

Persons performing managerial functions in the Company and employees of the Export Insurance Company KazakhExport Joint Stock Company (hereinafter referred to as the Company) are obliged to send to the Human Resources Management Department this completed and signed form from the date of adoption of the Policy, and newly accepted ones - from the moment of the beginning of the performance of labor and (or) official duties in the Company.

<i>Please fill out this form, sign it and send it in hard copy to the Human Resources Management Department of the Company</i>	From the moment you begin to perform your labor and/or official duties in the Company, you are obliged to carefully study, understand and faithfully follow the Policy.	
	Your confirmation	
	<i>(Please check the appropriate boxes)</i>	
	<input type="checkbox"/>	I confirm that I have studied and understood the Policy.
	<input type="checkbox"/>	I undertake to follow the Policy in good faith.
	<i>Please sign here</i>	
<input type="checkbox"/>	<i>Full name</i>	
<input type="checkbox"/>	<i>Signature</i>	<i>Date</i>

**Approval
on the adoption of anti-corruption restrictions**

I, (FULL NAME) _____, holding the position(s) _____ Joint Stock Company "Export Insurance Company "KazakhExport", in accordance with paragraph 1 of Article 12 The Law of the Republic of Kazakhstan "On Combating Corruption", as well as in order to comply with the requirements of the Anti-Corruption Policy in JSC "EIC "KazakhExport", I assume the following anti-corruption restrictions on:

1) carrying out activities incompatible with the performance of functional duties in the Company;

2) inadmissibility of joint service (work) of close relatives, spouses and relatives;

3) the use of official and other information that is not subject to official dissemination in order to obtain or extract property and non-property benefits and advantages;

4) acceptance of material remuneration, gifts or services for actions (inaction) in favor of the persons who provided them, if such actions are included in the official powers of the persons specified in the first paragraph, or these persons, by virtue of their official position, can contribute to such actions (inaction);

5) opening and holding accounts (deposits) in foreign banks located outside the Republic of Kazakhstan, storing cash and valuables in foreign banks located outside the Republic of Kazakhstan.

I am aware that family members of the person specified in the first paragraph are not entitled to receive material remuneration, gifts or services provided for the actions (inaction) of this person in favor of the persons who provided material remuneration, gifts or services, if such actions (inaction) are included in the official powers of this person or it is by virtue of his official position may contribute to such actions (inaction).

Signature of the official _____ date _____

**Results of anti-corruption monitoring,
conducted in JSC "EIC "KazakhExport" for ____ quarter of ____ year**

I. Introductory part

1. Subject of anti-corruption monitoring:
2. Anti-corruption monitoring was carried out ____ (specify full name and position), work
phone ____, e-mail ____.
3. The period of anti-corruption monitoring: started ____ finished ____.
4. Observed period: activity ____ years.

II. Information and analytical part

Quantitative and qualitative indicators characterizing the state and causes of corruption in the activities of JSC "EIC "KazakhExport".

III. The final part

Conclusions. Recommendations and suggestions for improving the anti-corruption measures taken.

Position of a Compliance Service employee

Full name

Guarantees of protection and non-prosecution of employees of JSC "ESC "KazakhExport" and persons reporting information on cases of corruption or fraud in JSC "ESC "KazakhExport"

1. These Guarantees to ensure the protection and non-prosecution of employees of JSC "ESC "KazakhExport" (hereinafter – the Company) and persons reporting cases of corruption or fraud in JSC "ESC "KazakhExport" (hereinafter - the Guarantees) establish minimum requirements for the Company in order to ensure the protection of employees of the Company and other persons reporting on corruption offenses and (or) cases of fraud in the Company, taking into account the provisions of the Anti-Corruption Policy of KazakhExport ESC JSC and the Rules for Preventing and Combating Fraud and Corruption in KazakhExport ESC JSC.

2. These Guarantees apply to employees of the Company and persons reporting information about corruption offenses and (or) cases of fraud in the Company, as a result of direct or indirect interaction with the Company.

3. Persons who anonymously report or publicly disclose information about corruption offenses and (or) cases of fraud in Society, but who were subsequently identified and prosecuted, are also subject to these Guarantees, provided that this information does not carry malicious intent and is not knowingly false.

4. These Guarantees do not apply to persons who, for the purpose of malicious intent, knowingly provide false information about the fact of a corruption offense and (or) fraud in the Company, who bear responsibility established by the laws of the Republic of Kazakhstan.

5. The Company, in addition to the measures provided for by the laws of the Republic of Kazakhstan, also guarantees protection from the following measures of harassment or discrimination of employees of the Company and other persons reporting information about the fact of a corruption offense and (or) fraud in the Company:

- 1) removal from office, dismissal or other equivalent measures;
- 2) demotion or refusal of promotion;
- 3) transfer to another job, reduction of wages or bonuses, change of working hours;
- 4) suspension of social support or training;
- 5) negative assessment of performance or characteristics from the workplace;
- 6) imposition or application of any disciplinary measure without a decision of the conciliation commission formed in accordance with the legislation of the Republic of Kazakhstan;
- 7) coercion, intimidation, harassment or ostracism;
- 8) discrimination in various forms or unfair treatment;
- 9) refusal to extend or early termination of an employment contract or a contract of a civil nature, if the employee or person had legitimate grounds to continue the employment or contractual relationship;
- 10) harming a person's reputation, including the media and social networks;
- 11) blacklisting on the basis of an industry-wide or industry-wide informal or formal agreement, entailing:
 - the emergence of obstacles for a person in the future when applying for employment in this sector or industry;
 - refusal to provide goods, works or services in a sector or industry over which the Company has influence;
- 12) refusal to provide the Company's services if the person had legitimate grounds to receive them;
- 13) early termination or termination of the contract for the supply of goods, works or services, if the person had legitimate grounds to continue the contractual relationship.

6. Employees of the Company and persons who report (have reported) the fact of a corruption offense and (or) fraud in the Company or are being persecuted or discriminated against for this report have the right to seek advice and protection from the Compliance Service of the Company personally or by sending through the channels of the Senim hotline.

7. Confidentiality of information about the treatment of employees of the Company or persons who were previously employees of the Company, reporting (reporting) the fact of a corruption offense and (or) fraud in the Company, is ensured if there is a signed agreement on non-disclosure of information about the assistance provided by an employee of the Company in combating corruption.

8. Individual labor disputes, the party to which are employees of the Company who report (have reported) the fact of a corruption offense or fraud in the Company, are considered and resolved by the conciliation commission of the Company in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

9. Employees of the Company and persons providing (who have provided) assistance in combating corruption in the Company shall be protected from violations of rights and legitimate interests in the field of labor relations for three years from the date of receipt by authorized state bodies of a report on the fact of a corruption offense or from the moment a person provides other assistance in combating corruption.

**Agreement
on non-disclosure of information on assistance in combating corruption**

Astana city

" ____ " ____ 20 ____

KazakhExport Export Insurance Company Joint Stock Company (hereinafter referred to as the Company), represented by _____, acting on the basis of _____ with on the one hand, hereinafter referred to as the "Head",

and _____ (last name, first name, patronymic (if any) of the employee)

on the other hand, hereinafter referred to as the "Employee", hereinafter collectively referred to as the "Parties", pursuant to the provisions of subparagraph 26) of paragraph 1 of Article 22 and subparagraph 29) of paragraph 2 of Article 23 of the Labor Code of the Republic of Kazakhstan, paragraphs 1, 2 and 4 of Article 24, subparagraph 2) of Article 24-1 and paragraph 2 of Article 24-3 of the Law of the Republic of Kazakhstan "On Combating Corruption" concluded this Agreement on the following:

The subject of the contract

1.1. By this Agreement, the Parties guarantee the non-disclosure of information about the Employee's appeal to the Head in order to report on

(the essence of the corruption offense)
in JSC "ESC "KazakhExport"
or

(the essence of the other assistance provided in combating corruption)
in JSC "KazakhExport ESC" (hereinafter referred to as confidential information), except for the cases provided for in paragraphs 2.1. and 2.2. of this Agreement.

Obligations of the Parties

2.1. The employee undertakes to:

1) after the conclusion of this Agreement, immediately inform the Head of the information that has become known to him about an upcoming, committed or committed corruption offense in the Company in which he works (worked), and (or) information aimed at providing other assistance in combating corruption in the Company in which he works (worked);

2) not to inform the Head of deliberately false information about a corruption offense;

3) not to disclose confidential information to other persons, except for:

officials of authorized state bodies and courts involved in the proceedings on a corruption offense reported by an Employee or the Employee provided other assistance in this case;

officials of the relevant authorized state body and the authorized anti-corruption body involved in the payment of a one-time monetary remuneration to an Employee;

4) in the case of submitting an application to the conciliation commission (if any) for consideration of an individual labor dispute within three years from the date of receipt by authorized state bodies of the Employee's notification of the fact of a corruption offense or from

the moment they provide other assistance in combating corruption specified in paragraph 1.1. of this Agreement, notify the Head of the upcoming consideration of the individual labor dispute by the conciliation commission no later than three working days before the date of filing an application to the conciliation commission;

5) not to use information that has become known to him about a corruption offense in the personal interests or interests of third parties;

6) to ensure the safety of this Agreement;

7) in case of an attempt by unauthorized persons to obtain confidential information or other information related to the Employee's assistance in combating corruption, immediately inform the Head with whom an agreement on non-disclosure of confidential information has been concluded.

2.2. The head undertakes to:

1) not to require an Employee to provide information that is not related to a corruption offense that is being prepared, committed or committed;

2) immediately transfer information about an upcoming, committed or committed corruption offense, and (or) information aimed at providing other assistance in combating corruption received from an Employee to an authorized state body, provided that an agreement on non-disclosure of confidential information is concluded with an official of the authorized state body;

3) not to disclose confidential information to other persons, except for:

officials of authorized state bodies and courts involved in the proceedings on a corruption offense reported by an Employee or the Employee provided other assistance in this case;

members of the conciliation commission, disciplinary commission or other collegial body of the Company in the cases provided for in subparagraphs 4) and 5) of this paragraph;

officials of the authorized anti-corruption body invited to a meeting of the conciliation commission, disciplinary commission or other collegial body of the Company;

4) in the case of consideration by the conciliation commission (if any) of an individual labor dispute, to which the Employee is a party, within three years from the date of receipt by authorized state bodies of the Employee's notification of the fact of a corruption offense or from the moment they provide other assistance in combating corruption specified in paragraph 1.1. of this Agreement, notify the members of the conciliation commission on the availability of this Agreement no later than the day the Employee submits an application to the conciliation commission;

6) ensure that an agreement on non-disclosure of confidential information is signed by an official of the authorized anti-corruption body invited to a meeting of the conciliation commission, disciplinary commission or other collegial body of the Company;

7) not to use information about an upcoming, committed or committed corruption offense and (or) information aimed at providing other assistance in combating corruption received from an Employee in the personal interests or interests of third parties;

8) to ensure the safety of this Agreement;

9) in case of an attempt by unauthorized persons to obtain confidential information or other information related to the Employee's assistance in combating corruption, immediately inform the authorized state body with which an agreement on non-disclosure of confidential information has been concluded.

Final provisions

3.1. By signing this Agreement, the Employee and the Manager confirm that they have been warned that they will be criminally liable for disclosure of confidential information in accordance with the current legislation of the Republic of Kazakhstan.

3.2. This Agreement comes into force from the moment it is signed by the Parties and is valid for the duration of the employment contract between the Employee and the state body /organization in which the Employee works, and after the termination of the employment contract – indefinitely.

3.3. This Agreement is drawn up in two copies in Russian, having the same legal force, one copy for each of the Parties.

Addresses, details and signatures of the Parties

Director:
Joint Stock Company "KazakhExport
Export Insurance Company"
BIN 030840002763
Legal address: Astana, Yesil district,
55a Mangilik El Ave., 11th floor
Contact phone: +7 7172 955656
Post: _____ /

(signature) (surname, initials)
MP

Worker:
Last name, first name, patronymic (if
any) _____

Identification document No.

from " __ " _____. ____ G. issued
IIN _____
Residential address

Contact phone number

(signature) (surname, initials)

**A copy of this
I have received the agreements:**

/ _____
(last name, initials)
(signature)

Date: " __ " _____ 20____

